

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

UNITED STATES OF AMERICA

v.

MICHAEL WEBB (01)

No. 4:19-CR-196-O

FACTUAL RESUME

INFORMATION:

Count One: Kidnapping, in violation of 18 U.S.C. § 1201

PLEA:

Guilty plea to Count One

MAXIMUM PENALTY:

- term of imprisonment for any term of years or for life but not less than 20 years;
- a fine up to the amount of \$250,000, or twice the pecuniary gain or twice the pecuniary loss;
- a mandatory special assessment of \$100;
- a term of supervised release of at least five (5) years up to any term of years to life. Revocation of the term of supervised release could result in an additional period of confinement. The effect of a revocation of a term of supervised release is to make the overall period of incarceration longer;
- restitution to victims or to the community, which may be mandatory under the law;
- registration as a sex offender;* and
- costs of incarceration and supervision.

ELEMENTS OF THE OFFENSE:

In order to establish the offense alleged in Count One of the Information, the Government must prove the following elements beyond a reasonable doubt:

- First: That the defendant, knowingly acting contrary to law, kidnapped MV1, as charged;
- Second: That the defendant held the person for some purpose or benefit;
- Third: That MV1 had not attained the age of 18 years;
- Fourth: That the defendant, a person 18 years of age or older, was not related to MV1 and did not have legal custody of MV1; and
- Fifth: That the defendant used any means, facility, or instrumentality of interstate or foreign commerce in committing or in furtherance of the commission of the offense.

STIPULATION OF FACTS:

1. On or about May 18, 2019, in the Fort Worth Division of the Northern District of Texas, defendant, Michael Webb, did unlawfully and willfully seize, kidnap, confine, abduct or carry away, or hold MV1, a child under 18 years of age, for his benefit or otherwise, and in committing and in furtherance of the commission of the offense, Webb used any means, facility, or instrumentality of interstate or foreign commerce. At the time, Webb was over 18 years of age, was not related to, and did not have legal custody of, MV1.

2. On May 18, 2019, Webb, age 51, unlawfully seized, kidnapped and carried away MV1, an 8-year-old child, while she was walking with her mother on Fifth Avenue in Fort Worth, Texas. Webb, a stranger to MV1, forced her into his car, a gray Ford 500. MV1's mother fought with Webb to prevent him from driving off with her daughter, but

Webb was able to push her out of the car and leave with the child. To avoid detection from the police, Webb first drove MV1 to a parking lot and ordered her to hide in the front passenger floorboard. When he thought it was safe to leave, Webb then transported MV1 in the car to a hotel frequented by interstate travelers, where he further concealed MV1 from detection by law enforcement.

3. In order to take MV1 to the hotel, Webb needed navigation assistance. He used his cell phone, which was connected to the Internet, to initiate Google maps. Based on the directions he received, Webb traveled on Interstate Highway 35 and Interstate Highway 20 to reach the hotel. The cell phone, the Internet, and the interstate highways were used to facilitate and to further the commission of the offense because they helped Webb reach the hotel by the most direct route.

4. In the early hours of May 19, 2019, Fort Worth Police located Webb and MV1 at the same hotel. Webb admitted that he knowingly and willfully seized and held *and assaulted mw Qs* MV1 ~~with the intent to assault her.~~

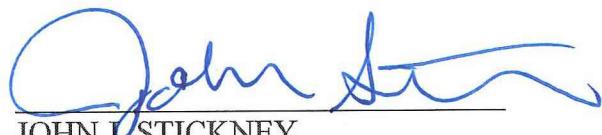
5. Webb stipulates that the cell phone, Internet, car, hotel, and interstate highways are each an instrumentality or means or facility of interstate or foreign commerce that he used to commit and further the commission of the kidnapping by transporting or concealing MV1.

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6. At the time Webb kidnapped MV1, he was unrelated to MV1, and did not have legal custody of MV1 or consent to seize MV1.

SIGNED and AGREED to on this the 17th day of June, 2019.

Michael Webb
MICHAEL WEBB
Defendant


JOHN J. STICKNEY
Attorney for Defendant

*Notification of Registration Requirement

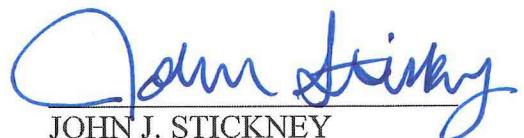
The defendant understands that he must register under SORNA, which is a federal law that applies broadly to offenses against children, and specifically includes kidnapping, *see* 34 U.S.C. § 20911(7)(A). Under SORNA, which is independent of any requirement of state law, he must register as a sex offender (under the expanded statutory definition that extends to offenses against children more generally, *see* 34 U.S.C. §§ 20911(7)(A)), and keep the registration current in at least each of the following jurisdictions: where he resides, where he is an employee, and where he is a student. He understand that the requirements for registration include providing at least his name, his residence address, and the names and addresses of any places where he is or will be an employee or a student, amongst other information. He may also be required to provide information about intended travel outside the United States.

The defendant further understands that the requirement to keep the registration current includes informing at least one jurisdiction in which he resides, is an employee, or is a student no later than three business days after any change of his name, residence, employment, or student status. The defendant understands that, failure to comply with these obligations subjects him to prosecution for, *inter alia*, failure to register under 18 U.S.C. § 2250, which is punishable by a fine or 10-years of imprisonment or both.

Michael Webb
MICHAEL WEBB

6/17/19
Date

I am the defendant's counsel. I have carefully reviewed every part of this Factual Resume with the defendant. To my knowledge and belief, my client's decision to enter into this Factual Resume is an informed and voluntary one.



JOHN J. STICKNEY
Attorney for Defendant

6/17/19

Date